

# **EXHIBIT D**



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (RCC)  
ECF Case

*This document relates to:*

*Thomas E. Burnett, Sr., et al. v. Al Baraka Investment & Development Corp., et al., Case No. 03-CV-9849 (S.D.N.Y.)*  
*Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 1:02-6977 (S.D.N.Y.)*  
*Federal Insurance Co., et al. v. Al Qaida, et al., Case No. 03-CV-6978 (S.D.N.Y.)*  
*Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., Case No. 04-CV-05970-UA (S.D.N.Y.)*  
*Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., Case No. 04-CV-07279-UA (S.D.N.Y.)*  
*New York Marine and General Insurance Co. v. Al Qaida, et al., Case No. 04-CV-6105 (S.D.N.Y.)*  
*World Trade Center Properties, LLC, et al. v. Al Baraka Investment and Development Corp., et al., Case No. 04-CV-7280 (S.D.N.Y.)*

**AFFIDAVIT OF TARIQ BINLADIN**

I, Tariq Binladin, state under penalty of perjury, as follows:

1. I was born in Saudi Arabia in 1950 and am a citizen of the Kingdom of Saudi Arabia. I currently reside in Dubai.
2. I am one of 54 children of Mohammad Awad Binladin. Osama Bin Laden is my half-brother, but we have different mothers and grew up in different households. We had very limited contact growing up, typically only at occasional large family gatherings. I have not seen or communicated with Osama since late 1992 or early 1993.
3. I have never lived in the United States. The last time I visited the United States for any reason was in 1988, when my brother Salem was killed there in a plane crash.

4. I am not now and never have been employed by the Saudi Binladin Group ("SBG") or any of its divisions or subsidiaries. I have never held any managerial position at SBG, nor have I ever been a director. In the early 1980's, I was the manager of the contracting division of Mohammad Binladin Establishment, the predecessor of Mohammad Binladin Company ("MBC"), but I have never been employed by MBC, nor held any managerial position at that company. I am a member of the board of directors of MBC.

5. In late 1992 or early 1993, I made a brief trip to the Sudan in an attempt to convince Osama to abandon his criticisms of the Saudi government and return to Saudi Arabia. The entire round trip to and from the Sudan lasted only a few hours, and my meeting with Osama thus was short. Osama said that he was happy in the Sudan and did not want to return to Saudi Arabia, as he was focused on building his businesses in the Sudan. I understood and believed that the businesses he was starting were legitimate ventures, and I did not see or hear anything during the visit suggesting that he was involved in terrorist or violent activities of any kind. Nor did he express any hostility toward the United States. That was the last time I had any contact with Osama.

6. In June 1993, the shareholders of MBC and SBG, including myself, adopted resolutions to amend the Articles of Association to remove Osama as an owner of those entities. I supported that action because I believed Osama's vocal criticisms of the Saudi government were harming the companies' reputations in the Middle East.

7. To the best of my knowledge, since at least June 1993, Osama has received no distributions of funds or other support from MBC, SBG or any of their subsidiaries or affiliates. Since that date, I have not authorized any person or entity to make any payments to, do business with, or otherwise provide any support to Osama, nor have I personally provided any such

A handwritten signature in blue ink, consisting of a stylized, cursive script that appears to be the name 'S. Binladin'.

support to Osama. Plaintiffs' allegation that "[t]he family dedicated 50 million Saudi Riyals to the protection of Osama" after September 11, 2001, and that I participated in funding this "protection," is completely false.

8. I have never been the "general supervisor" or "worldwide director" of the International Islamic Relief Organization ("IIRO"). Nor have I held any other leadership position in that charity.

9. I have never had any managerial role in Cambridge Engineering, nor have I ever had any control over its bank accounts. In fact, I had not heard of the company until plaintiffs' allegations were brought to my attention.

10. I have never donated any funds or provided any support to any organization I understood to be associated with al Qaeda or with terrorism of any kind. Nor have I ever donated money to any charitable organization with the intent, or with any reason to believe, that it would be used to support terrorism. I was appalled by the horrific events of September 11, 2001, and I reject and condemn such violence.

United Arab Emirates  
Consular District of the  
Consulate General of the  
United States of America  
at Dubai } S.S.

  
TARIQ BINLADIN

Sworn to before me this  
\_\_\_\_ day of January, 2006 25 JAN 2006

Valerie J. Chittenden  
Consul of the United States of America  
Dubai, United Arab Emirates



Notary Public

My Commission Expires INDEFINITELY